

MMS
**NATIONAL
OFFICE
POTENTIAL INCIDENT
OF
NONCOMPLIANCE (PINC)
LIST**



PREFACE

The Safety and Enforcement Branch of the Engineering and Operations Division wish to extend our appreciation to all participating MMS personnel for their dedicated effort and expertise in developing this edition of the National Office PINC List.

Revisions to the National Office PINC List

The following format is presented as a means for MMS personnel to suggest revisions to the National Office PINC List. All suggested revisions will be reviewed by the Office PINC Team. Before revisions are included in the National Office PINC List they will be routed to the Headquarters Division Chiefs and the Regional Directors, or their staff, for review and comment. Please submit suggested revisions directly to:

Minerals Management Service
Office PINC Team
Safety and Enforcement Branch
Mail Stop 4023
381 Elden Street
Herndon, Virginia 20170

Suggested Revision Format:

PINC Number:
PINC Statement:
Authority:
Enforcement Action:
Rationale/Note:
Definition:
Inspection Procedure:
If Noncompliance Exists:

Please be advised:

The guidelines in this document are to be considered the most preferable way of implementing the inspection and enforcement of each Office PINC and not intended as a directive or to supersede the regulatory language of the Code of Federal Regulations.

Also, the enforcement status of a Facility Shut-in (S) INC or a Component Shut-in (C) INC may not necessarily require the full extent of the enforcement specified. The issuing office has full authority to use their discretion when issuing a Component Shut-in (C) INC. However, when issuing a Facility Shut-in INC the issuing office must solicit approval from the Associate Director for Offshore Minerals Management prior to the actual shut-in of a facility. The only exception to this requirement is when there is an imminent danger to personnel, property, or the environment, exacting a more immediate MMS response.

DESCRIPTION OF THE GUIDELINES FOR THE NATIONAL OFFICE PINC LIST

The guidelines for the Office PINC List establish the procedures MMS office personnel use to identify incidents of noncompliance with MMS regulations found during reviews in MMS offices and to notify Lessees of these incidents of noncompliance. The intent of these guidelines is to ensure that MMS regulations are imposed fairly and consistently for OCS operations. The information provided in the National Office PINC List is shown in the following format:

PINC NUMBER: A unique identifier for the specific requirement.

PINC STATEMENT: The clear and concise description of the requirement.

AUTHORITY: The regulatory authority as found in the Code of Federal Regulations.

ENFORCEMENT ACTION: The action to be taken by the MMS for an identified violation. These actions are a complete facility shut-in (S), a component shut-in (C), or a warning (W). When more than one enforcement is listed, the criteria for each enforcement action is provided in the “IF NONCOMPLIANCE EXISTS” block.

RATIONALE/NOTE: If needed, additional information describing the basis or providing background information pertinent to the requirement stated in the “PINC Statement” block.

DEFINITION: If needed, definitions of terms used in the PINC.

INSPECTION PROCEDURE: Preferred detailed guidelines to be used by the MMS office personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

IF NONCOMPLIANCE EXISTS: Describes the specific enforcement action to be taken when a violation of the regulations is determined. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement. The number of INC's to be issued for each violation is indicated.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC is issued, since a shut-in would serve no useful purpose.

ACRONYMS USED

Enforcement Actions

W - Warning

C - Component Shut-in

S - Facility (Platform/Rig/Operation) Shut-in

Other Acronyms:

APD - Application for Permit to Drill (form MMS-123)

API - American Petroleum Institute

APM - Application for Permit to Modify (form MMS-124)

CFR - Code of Federal Regulations

DOCD - Development Operations Coordination Document

DOI - Department of the Interior

DPP - Development Production Plan

EOR - End of Operations Report

G&G - Geological and Geophysical

INC - Incident of Noncompliance

MAOP - Maximum Allowable Operating Pressure

MMS - Minerals Management Service

MODU - Mobile Offshore Drilling Unit

MPMS - Manual of Petroleum Standards

MPR - Maximum Production Rate

OCS - Outer Continental Shelf

PINC - Potential Incident of Noncompliance

POE - Plan of Exploration

ROW - Right-of-Way

SAC - Safety Analysis Checklist

SAFE - Safety Analysis Function Evaluation

TIMS - Technical Information Management System

TVD - True Vertical Depth

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GENERAL OPERATIONS

(Last updated - August 2005)

G-801	ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS? Authority: 30 CFR 250.101 Enforcement Action: W/C/S INSPECTION PROCEDURE: Verify that operations are being conducted in accordance with the lease stipulation. IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-in (C) INC for an audit of one or more operations on a facility if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-in without affecting the overall safety of the facility. Issue one facility shut-in (S) INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.
G-802	ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS? Authority: 30 CFR 250.410 30 CFR 250.802 30 CFR 250.900 (b) (c) (d) (e) (f) 30 CFR 250.1202(a) (1) 30 CFR 250.1204(a) 30 CFR 250.1725 (c) Enforcement Action: W/C/S INSPECTION PROCEDURE: Verify that operations are being conducted in accordance with the approved application, i.e., APD's, SAFE and SAC charts, etc. IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the application(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility. Issue one facility shut-in (S) INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility. Note: Do not issue an INC when the operator's safety devices, systems, and equipment are installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by MMS will be communicated to the operators by the production engineer.

G-803

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?

Authority: 30 CFR 250.200

Enforcement Action: W/C/S

30 CFR 254.2

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DPP's, DOCD's, Oil Spill Response Plans, Pipeline Applications and Applications to Permit to Drill etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (**C**) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (**S**) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

RECORDS

G-811

IS REQUIRED PAPERWORK SUBMITTED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 30 CFR 250.465

Enforcement Action: W/C

30 CFR 250.468

30 CFR 250.513(a)

30 CFR 250.613(a)

30 CFR 250.613(d)

30 CFR 250.703(c)

30 CFR 250.1008

30 CFR 250.1202(c)(4)

30 CFR 250.1202(d)(5)

30 CFR 250.1202(f)(2)

30 CFR 250.1203(b)(8)

30 CFR 250.1729

30 CFR 250.1740

30 CFR 250.1743 (b)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

PLATFORMS & STRUCTURES

G-821 **HAVE THE PLATFORMS AND STRUCTURES BEEN DESIGNED, FABRICATED, INSTALLED, USED, INSPECTED, AND MAINTAINED TO ENSURE ITS STRUCTURAL INTEGRITY FOR SAFE CONDUCT OF DRILLING, WORKOVER, AND PRODUCTION OPERATIONS?**

Authority: 30 CFR 250.900(a)
30 CFR 250.900(b)

Enforcement Action: W

Note: Use this PINC where no other PINC for platforms and structures applies.

INSPECTION PROCEDURE:

Verify that the platforms and structures have been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity for safe conduct of drilling, workover, and production operations.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if the platforms and structures have not been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity.

G-822 **DOES THE LESSEE COMPILE, RETAIN, AND MAKE AVAILABLE PLATFORM STRUCTURAL RECORDS FOR THE LIFE OF THE PLATFORM, INCLUDING THE RESULTS OF PLATFORM STRUCTURAL INSPECTIONS?**

Authority: 30 CFR 250.912
30 CFR 250.914

Enforcement Action: W

INSPECTION PROCEDURE:

1. Review operator records to verify that the records for each platform are available.
2. Verify that the lessee maintains for the functional life of the platform the following records:
 - A. The as-built structural drawings.
 - B. The design assumptions and analyses.
 - C. A summary of the nondestructive examination records.
 - D. The inspection results from platform inspections.
3. Verify that the records for each inspection include:
 - A. The type of inspection employed (e.g., visual, magnetic particle, or ultrasonic testing).
 - B. A summary of the testing results.
 - C. What repairs, if any, were needed.
 - D. What repairs were made.
 - E. The overall structural condition of the platform.
4. Verify that the platform has been inspected at intervals required by MMS.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if operator records:

1. Are not available.
 2. Do not contain all of the required information.
 3. Do not indicate that the inspections were performed at the required frequency.
-

G-823 **HAS THE OPERATOR PERFORMED THE REQUIRED STRUCTURAL SURVEYS FOR THE PLATFORM AND SUBMITTED A REPORT OF THE RESULTS ANNUALLY BY NOVEMBER 1 TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.912

Enforcement Action: W

INSPECTION PROCEDURE:

Review records in TIMS and documentation submitted by operator and others to determine if the platform is in compliance with the structural survey inspection and reporting requirements.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a records audit of a facility if records indicate that the existing platform was not in compliance with the structural survey inspection and reporting requirements.

BONDING

G-831

DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND REQUIRED?

Authority: 30 CFR 256.52

Enforcement Action: W/S

30 CFR 256.53

30 CFR 256.54

INSPECTION PROCEDURE:

1. Verify that the general bond complies with the levels of development on the lease.
2. Verify that the supplemental bond complies with the MMS requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond for the dollar amount in question.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if bonding requirements are not met.

Issue one facility shut-in (S) INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

G-832

IF A BOND LAPSES OR DECREASES IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO THE REGIONAL DIRECTOR?

Authority: 30 CFR 256.52(e)

Enforcement Action: W/S

30 CFR 256.55

30 CFR 256.56

30 CFR 256.57

INSPECTION PROCEDURE:

1. If the value of a bond submitted as security to the MMS has decreased in value, verify the lessee has provided evidence of additional alternative financial security to the Regional Director within 6 months or such shorter period of time as the Regional Director may direct.
2. If a bond submitted as security to the MMS has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to the Regional Director.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.

Issue one facility shut-in (S) INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to the Regional Director.

G-833

HAS THE LESSEE NOTIFIED THE REGIONAL DIRECTOR WITHIN 72 HOURS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?

Authority: 30 CFR 256.55(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Regional Director was notified within 72 hours after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of required financial coverage if the Regional Director was not notified as required.

TRAINING

Definition of Evidence: Evidence is any documentation of training associated with training programs and training results (i.e., testing, interviewing and training etc.)

G-841	<p>HAS A WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM BEEN ESTABLISHED AND IMPLEMENTED?</p> <p>Authority: 30 CFR 250.1503(a) Enforcement Action: S</p> <p>INSPECTION PROCEDURE: Verify that the lessee has established and implemented a training program.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one facility shut-in (S) INC for an audit of a lessee's training program if the training program for well-control and production safety duties is not established and implemented.</p> <p>Note: The one or more affected facilities of the lessee is the facility.</p>
G-842	<p>CAN THE LESSEE EXPLAIN ITS OVERALL WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM AND PRODUCE EVIDENCE TO SUPPORT THE EXPLANATION DURING A TRAINING SYSTEM AUDIT CONDUCTED BY THE MMS OR ITS AUTHORIZED REPRESENTATIVE?</p> <p>Authority: 30 CFR 250.1507(a) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify during audit that the lessee can explain its overall training program and produce evidence to support the explanation.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a training system audit if the lessee cannot explain its overall training program and produce evidence to support the explanation.</p>
G-843	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?</p> <p>Authority: 30 CFR 250.1503(b)(1) Enforcement Action: W 30 CFR 250.1507(a)</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices. Verify that procedures are being followed by reviewing employee records.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.</p>
G-844	<p>DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE TYPE, METHOD(S), LENGTH, FREQUENCY, AND CONTENT OF THE TRAINING FOR EMPLOYEES?</p> <p>Authority: 30 CFR 250.1503(b) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan specifies the type, method(s), length, frequency, and content of the training for employees.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the type, method(s), length, frequency, and content of the training for employees.</p>

G-845	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?</p> <p>Authority: 30 CFR 250.1503(b)(4) 30 CFR 250.1507(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis. Verify through records review that the procedures are being implemented.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.</p>
G-846	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?</p> <p>Authority: 30 CFR 250.1503(b)(2) 30 CFR 250.1507(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan includes procedures for evaluating the training programs of contractors. Verify through records review that the evaluations are being conducted as per the procedures.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted .</p>
G-847	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?</p> <p>Authority: 30 CFR 250.1503(b)(6) 30 CFR 250.1507(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan includes procedures for internal audits. Verify through records review that the internal audits are being conducted as per the procedures.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits or documentation fails to indicate that the internal audits are being conducted.</p>
G-848	<p>DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT MANAGER?</p> <p>Authority: 30 CFR 250.1503(c)(2) Enforcement Action: S</p> <p>INSPECTION PROCEDURE: Verify that a training plan was provided when requested by the MMS Regional or District Manager.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by the MMS Regional or District Manager.</p> <p>Note: The one or more affected facilities is the facility.</p>

G-849	<p>DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE METHOD(S) OF VERIFYING EMPLOYEES' UNDERSTANDING AND PERFORMANCE?</p> <p>Authority: 30 CFR 250.1503(b) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan specifies the method(s) of verifying employees' understanding and performance.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the method(s) of verifying employees' understanding and performance.</p>
G-850	<p>ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?</p> <p>Authority: 30 CFR 250.1506(b) Enforcement Action: W 30 CFR 250.1507(a)</p> <p>INSPECTION PROCEDURE: Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties. Verify through records review that procedures are being followed</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.</p>
G-851	<p>DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD) THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDES FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?</p> <p>Authority: 30 CFR 250.1506(c) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the lessee has not ensured (either through the contractor evaluation or other method that the contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.</p>
G-852	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?</p> <p>Authority: 30 CFR 250.1503(b)(3) Enforcement Action: W 30 CFR 250.1507(a)</p> <p>INSPECTION PROCEDURE: Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties. Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.</p>

G-853	<p>ARE ALTERNATIVE WELL-CONTROL AND PRODUCTION SAFETY TRAINING METHODS CONDUCTED IN ACCORDANCE WITH, AND MEET, THE OBJECTIVES OF THE TRAINING PLAN?</p> <p>Authority: 30 CFR 250.1503(a) 30 CFR 250.1504</p> <p>Enforcement Action: W</p> <p>Note: Alternative methods may include computer-based learning, films, or their equivalent. This type of training should be reinforced by appropriate demonstrations and hands-on training.</p> <p>INSPECTION PROCEDURE: Verify that alternative methods conducted are in accordance with, and meet, the objectives of the training plan.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if alternative training methods conducted are not in accordance with, and meet, the objectives of the training plan.</p>
G-854	<p>IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?</p> <p>Authority: 30 CFR 250.1503(a) 30 CFR 250.1505</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that training for employees is from sources that meet the requirements of the training plan.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.</p>
G-855	<p>IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?</p> <p>Authority: 30 CFR 250.1506(a)</p> <p>Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none"> 1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. 2. Verify through records reviews that periodic training is conducted to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. Issue one component shut-in (C) INC for each employee that has not received periodic training (in accordance with the plan) to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.</p> <p>Note: The employee is the component.</p>
G-856	<p>DOES EACH EMPLOYEE UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?</p> <p>Authority: 30 CFR 250.1503(a)</p> <p>Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan provides a process to ensure that employees understand and can perform their assigned well-control or production safety duties.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more employees if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties. Issue one component shut-in (C) INC for one or more employees that do not understand or cannot perform the assigned well-control or production safety duties.</p> <p>Note: The employee is the component.</p>

G-857	<p>DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, OR HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?</p> <p>Authority: 30 CFR 250.1507(c) (d) 30 CFR 250.1508(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that MMS or its authorized representative is allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.</p>
G-858	<p>DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER OR WITNESS HANDS-ON, SIMULATOR, OR OTHER TYPES OF WELL-CONTROL AND PRODUCTION SAFETY TESTING?</p> <p>Authority: 30 CFR 250.1507(d) 30 CFR 250.1509(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that MMS or its authorized representative is allowed to administer or witness testing.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer or witness testing.</p>
G-859	<p>DOES THE LESSEE PAY FOR ALL COSTS ASSOCIATED WITH WELL-CONTROL OR PRODUCTION SAFETY TESTING, EXCLUDING SALARY AND TRAVEL COSTS FOR MMS PERSONNEL?</p> <p>Authority: 30 CFR 250.1507(d) 30 CFR 250.1509(c)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that the lessee pays for all costs associated with testing, excluding salary and travel costs for MMS personnel.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the lessee fails to pay for all costs associated with testing, excluding salary and travel costs for MMS personnel.</p>
G-860	<p>DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR RECORD KEEPING AND DOCUMENTATION OF WELL-CONTROL AND PRODUCTION SAFETY TRAINING?</p> <p>Authority: 30 CFR 250.1503(b)(5)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan includes procedures for record keeping and documentation.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for record keeping and documentation.</p>

G-861	<p>DOES THE LESSEE IDENTIFY PERSONNEL BY CURRENT POSITION, YEARS OF EXPERIENCE IN PRESENT POSITION, YEARS OF TOTAL OIL FIELD EXPERIENCE, AND EMPLOYER NAME, AT THE WORK SITE OR ONSHORE LOCATION?</p> <p>Authority: 30 CFR 250.1508(b) Enforcement Action: W 30 CFR 250.1509(b)</p> <p>INSPECTION PROCEDURE: Verify that lessee records identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name (e.g., operator, contractor, or subcontractor name).</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if lessee records fail to identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name.</p>
G-862	<p>DOES THE LESSEE PROVIDE COPIES OF TRAINING DOCUMENTATION FOR PERSONNEL INVOLVED IN WELL-CONTROL OR PRODUCTION SAFETY OPERATIONS FOR THE PAST FIVE YEARS WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT MANAGER?</p> <p>Authority: 30 CFR 250.1503(c)(1) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that training documentation was provided when requested by the MMS Regional or District Manager.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program for each request if the lessee failed to provide the training documentation when requested by the MMS Regional or District Manager.</p>

PRODUCTION REPORTING

G-881 HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT MANAGER OF INITIAL PRODUCTION FROM A LEASE?

Authority: 30 CFR 250.180(a)(1)
30 CFR 250.180(i)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify from records that initial production has started and that the District Manager has been notified of initial production from each lease within 5 days of initial production.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the District Manager has not been notified within 5 days after initial production has been initiated on the lease.

G-882 HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT MANAGER OF CESSATION OF PRODUCTION ON A LEASE?

Authority: 30 CFR 250.180(a)(1)
30 CFR 250.180(i)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify from records that when production has ceased from a lease, the District Manager has been notified within 15 days after the first full month of zero production.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the District Manager has not been notified within 15 days after the first full month of zero production on the lease.

ACCIDENT REPORTING

G-891

HAS THE SUPERVISOR BEEN NOTIFIED OF ALL SERIOUS ACCIDENTS, ANY DEATH OR SERIOUS INJURY, AND ALL FIRES, EXPLOSIONS AND BLOWOUTS CONNECTED WITH ANY ACTIVITIES OR OPERATIONS ON A LEASE?

Authority: 30 CFR 250.191(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the District Manager has been notified of all serious accidents, any death or serious injury, and all fires, explosions and blowouts connected with any activities on a lease.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an incident/accident on a lease if the District Manager has not been notified by the lessee as required.

ENVIRONMENTAL PROTECTION

OIL SPILL RESPONSE PLANS

E-801	<p>HAS AN OIL SPILL RESPONSE PLAN BEEN APPROVED BY OR HAS A CERTIFICATION OF CAPABILITY TO RESPOND BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR A FACILITY PRIOR TO OPERATING THAT FACILITY?</p> <p>Authority: 30 CFR 254.2</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that an Oil Spill Response Plan has been approved or a certification of capability to respond has been submitted to the Regional Supervisor prior to operating the specified facility.</p> <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for an audit of any facility if an Oil Spill Response Plan has not been approved or a complete certification of capability to respond has not been submitted to cover that facility prior to operating the facility.</p>
E-802	<p>HAS EACH OIL SPILL RESPONSE PLAN BEEN REVIEWED AND HAVE THE RESULTING MODIFICATIONS BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL WHEN REVISIONS ARE MADE TO THE PLAN?</p> <p>Authority: 30 CFR 254.30(a) 30 CFR 254.30(b)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none">1. Verify that the lessee or operator has reviewed each of his Oil Spill Response Plans at least every 2 years for adequacy to meet current conditions.2. Verify that the lessee or operator has informed the Regional Supervisor that there are no changes to an Oil Spill Response Plan as a result of each review.3. Verify that revisions to an Oil Spill Response Plan are submitted within 15 days to the Regional Supervisor for approval whenever:<ol style="list-style-type: none">A. A change occurs which significantly reduces the response capabilities.B. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.C. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.D. A significant change is made to the Area Contingency Plan(s). <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for each audit of each Oil Spill Response Plan if:</p> <ol style="list-style-type: none">1. The Oil Spill response Plan has not been reviewed for adequacy at least every 2 years.2. The Regional Supervisor has not been notified of the results of each Oil Spill Response Plan review.3. Revisions to each Oil Spill Response Plan have not been submitted for approval to the Regional Supervisor within 15 days of making the revision.

E-811	<p>HAS THE OWNER(S) OR OPERATOR(S) OF AN OFFSHORE FACILITY LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED AN OIL SPILL RESPONSE PLAN, PREPARED IN ACCORDANCE WITH ONE OF THE APPROVED METHODS, TO THE REGIONAL SUPERVISOR FOR APPROVAL?</p> <p>Authority: 30 CFR 254.50 30 CFR 254.51 30 CFR 254.52 30 CFR 254.53</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none"> 1. Verify that an oil spill response plan was submitted to the Regional Supervisor for approval. 2. Verify that the oil spill response plan was prepared in accordance with one of the approved methods. 3. Verify that the oil spill response plan contains the required information. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for each required oil spill response plan audited if:</p> <ol style="list-style-type: none"> 1. An oil spill response plan was not submitted to the Regional Supervisor for approval. 2. The submitted oil spill response plan was not prepared in accordance with one of the approved methods. 3. The submitted oil spill response plan does not contain the required information.
E-812	<p>HAS THE OWNER(S) OR OPERATOR(S) OF OFFSHORE FACILITIES LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED REQUIRED ADDITIONAL OIL SPILL PREVENTION INFORMATION TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 254.54</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that, in addition to the oil spill response plan, the following information was submitted to the Regional Supervisor:</p> <ol style="list-style-type: none"> 1. A description of the steps being taken to prevent spills of oil or mitigate a substantial threat of such a discharge. 2. Identification of all State or Federal safety or pollution prevention requirements that apply to the prevention of oil spills the facility, and a demonstration of compliance with these requirements. 3. A description of industry safety and pollution prevention standards the facility meets. 4. A description of how any additional equipment or procedures prescribed by the Regional Supervisor are incorporated. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for each set of submitted additional oil spill prevention information audited if:</p> <ol style="list-style-type: none"> 1. The required additional information has not been submitted with the oil spill response plan. 2. The additional information submitted is incomplete or inadequate.

TRAINING

E-821

ARE THE REQUIRED RECORDS OF OIL SPILL RESPONSE TRAINING FOR SPILL-RESPONSE OPERATING TEAM AND THE SPILL-RESPONSE MANAGEMENT TEAM FOR OCS FACILITIES AVAILABLE FOR REVIEW UPON REQUEST BY THE AUTHORIZED MMS REPRESENTATIVES , AND ARE THE RECORDS KEPT FOR AT LEAST 2 YEARS?

Authority: 30 CFR 254.41

Enforcement Action: W

DEFINITION:

Records – Training certificates and training attendance records issued by the organization(s) providing the training.

INSPECTION PROCEDURE:

1. Review the current approved Oil Spill Response Plan to identify members of the Spill-response Operating Team and Spill-response Management Team, including the spill-response coordinator and alternates.
2. Review the current approved Oil Spill Response Plan to identify the location of the oil spill response training records.
3. Verify that the oil spill response training records are available for review and are kept for at least 2 years.
4. Verify that the records show that:
 - A. Hands-on training, including deployment and operation of the response equipment to be used, of the Spill-response Operating Team was attended at least annually.
 - B. Those personnel responsible for supervising the Spill-response Operating Team have been trained in directing the deployment and use of the response equipment at least annually.
 - C. The annual training of the Spill-response Management Team, including the spill-response coordinator and alternates, include instructions on:
 - (1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment.
 - (2) Spill reporting procedures.
 - (3) Oil-spill trajectory analysis and predicting spill movement.
 - (4) Any other responsibilities the spill management team may have.
5. Verify that the records show testing has been performed to ensure that each individual identified is sufficiently trained to perform the required duties

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of the oil spill response training records if the records:

1. Are not available for review.
 2. Are not kept for at least 2 years.
 3. Do not show that all Spill-response Operating Team and Spill-response Management Team members received the required training.
 4. Do not show that the testing has been performed.
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EXERCISES

E-831	<p>HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF THE DATE OF ANY OIL SPILL RESPONSE PLAN EXERCISE FOR OCS FACILITIES AT LEAST 30 DAYS BEFORE THE EXERCISE?</p> <p>Authority: 30 CFR 254.42(f) Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that the Regional Supervisor has been notified of the following exercises at least 30 days before they are conducted:</p> <ol style="list-style-type: none">1. Annual spill management team tabletop exercise;2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations; and3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for each exercise if the Regional Supervisor was not notified of the exercise within the required time frame.</p>
E-832	<p>ARE EXERCISES FOR ALL PARTS OF EACH ENTIRE OIL SPILL RESPONSE PLAN FOR OCS FACILITIES CONDUCTED AT LEAST ONCE EVERY 3 YEARS?</p> <p>Authority: 30 CFR 254.42(a) Enforcement Action: W 30 CFR 254.42(b) 30 CFR 254.42(c) 30 CFR 254.42(d)</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that exercises of an entire Oil Spill Response Plan, including response personnel and equipment, is exercised at least once every 3 years.</p> <p>Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.</p> <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for an audit of an Oil Spill Response Plan if records do not indicate that all parts of the Plan were not exercised at least once every 3 years.</p>
E-833	<p>ARE EXERCISES OF SPECIFIED PORTIONS OF THE OIL SPILL RESPONSE PLAN FOR OCS FACILITIES EXERCISED MORE FREQUENTLY THAN ONCE EVERY 3 YEARS?</p> <p>Authority: 30 CFR 254.42(b) Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <p>Review the pollution control equipment drill records to verify that:</p> <ol style="list-style-type: none">1. A spill management team tabletop exercise was conducted in the last 12 months.2. A deployment exercise of the response equipment identified in the oil spill response plan was conducted in the last 12 months.3. A notification exercise for each facility that is manned on a 24-hour basis was conducted in the last 12 months.4. A deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels was conducted in the last 6 months. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for each audit of the oil spill response plan if:</p> <ol style="list-style-type: none">1. The exercises are not conducted within the required time period.2. The exercises did not incorporate the proper tests.3. The spill scenario was revealed prior to the start of any exercise.

OIL SPILL REPORTS

E-841

HAS THE LESSEE OR OPERATOR REPORTED EACH OIL SPILL OBSERVED FROM OCS FACILITIES?

Authority: 30 CFR 250.46

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the lessee or operator immediately notified the National Response Center if an oil spill is observed:
 - A. From the lessee's or operator's facility.
 - B. From another offshore facility.
 - C. Of unknown origin.
2. Verify that the lessee or operator notified the Regional Supervisor orally without delay, with a written follow-up report, if an oil spill estimated to be one barrel or more from the lessee's or operator's facility is observed.
3. Verify that the lessee or operator immediately notified the Regional Supervisor and responsible party if an oil spill from another offshore facility is observed

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each oil spill audit if:

1. Records indicate that an oil spill was observed and not reported within the specified time period.
 2. A written follow-up report for an oil spill of one barrel or more from the lessee's or operator's facility was not received by the Regional Supervisor within 15 days after the spillage has been stopped.
 3. The written report to the Regional Supervisor for any oil spill of 50 barrels or more does not include information on the sea state, meteorological conditions, the size and appearance of the oil slick, and any additional information required by the Regional Supervisor if it is determined that an analysis of the oil spill response is necessary.
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DRILLING

PLAN APPROVAL

D-801	<p>HAS WRITTEN APPROVAL TO DRILL, SIDETRACK, BYPASS, OR DEEPEN A WELL BEEN RECEIVED?</p> <p>Authority: 30 CFR 250.410 Enforcement Action: C</p> <p>INSPECTION PROCEDURE: Verify that approval to drill, sidetrack, or deepen a well was received from the District Manager.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one component shut-in (C) INC for an audit of a drilling operation if drilling, sidetracking, bypassing, or deepening approval has not been received.</p> <p>Note: The well is the component.</p>
D-802	<p>DOES THE LESSEE HAVE WRITTEN OR ORAL APPROVAL TO CHANGE PLANS, MAKE CHANGES IN MAJOR DRILLING EQUIPMENT OR PLUG BACK A WELL?</p> <p>Authority: 30 CFR 250.465(a)(1) Enforcement Action: C</p> <p>INSPECTION PROCEDURE: Verify that any changes from the approved plans have been received and approved by the District Manager.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one component shut-in (C) INC for an audit of a drilling operation if the records indicate that approval has not been received for any changes from the approved plans.</p> <p>Note: The well is the component.</p>
D-803	<p>IS THE DISTRICT MANAGER GIVEN AT LEAST 24 HOURS NOTICE BEFORE STARTING A WELL TEST?</p> <p>Authority: 30 CFR 250.460(b) Enforcement Action: W</p> <p>Note: For a well test to be conducted, it must be included in the projected plans for the test in the APD (form MMS-123) or in the APM (form MMS-124).</p> <p>INSPECTION PROCEDURE: Verify that the District Manager was notified as required.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a drilling operation if the District Manager was not notified as required before the start of a well test.</p>

CASING PROGRAM

D-821

IS CASING SET AS APPROVED?

Authority: 30 CFR 250.420

Enforcement Action: W

INSPECTION PROCEDURE:

Compare APD approved proposed casing setting depths to on-site records of actual casing setting depths for all strings of casing set.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of a well's casing setting depths if the casing was not set as approved in the APD.

D-822

IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE APPROVED APD, HAS THE CHANGE BEEN APPROVED?

Authority: 30 CFR 250.428(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect records to verify that casings are set as approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of a drilling operation if the casing was set deeper without approval.

D-823

ARE AT LEAST TWO CEMENTED CASING STRINGS IN THE WELL PRIOR TO PRODUCING THE WELL?

Authority: 30 CFR 250.428(f)

Enforcement Action: W

Note: Does not include liners.

INSPECTION PROCEDURE:

Inspect on-site records to verify that at least two casing strings are set and cemented.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if there are not at least two casing strings set prior to producing.

WELL CONTROL

D-831

ARE DRILLING OPERATIONS SUSPENDED WHEN THE SAFE MARGIN, AS APPROVED IN THE APD, BETWEEN THE DRILLING FLUID WEIGHT IN USE AND THE EQUIVALENT DRILLING FLUID WEIGHT AT THE CASING SHOE IS NOT MAINTAINED?

Authority: 30 CFR 250.427(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect the records to determine if the drilling fluid weight is within a safe margin of the equivalent drilling fluid weight. A safe margin is to be approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a drilling operation if records indicate the safe margin has not been maintained.

RIG MOVEMENT

D-841

IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT MANAGER 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?

Authority: 30 CFR 250.403(a)

Enforcement Action: W

30 CFR 250.403(b)

INSPECTION PROCEDURE:

Verify that the Operator has properly notified the District Manager of:

1. Arrival of the MODU on location.
2. Movement of a platform rig to a platform.
3. Movement of a platform rig to another slot.
4. Movement of a MODU to another slot.
5. Departure of a MODU from the location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a drilling unit relocation if the proper notification of the drilling unit movement has not been submitted to the District Manager.

WELL-COMPLETIONS

C-801

**HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT
MANAGER PRIOR TO CONDUCTING WELL-COMPLETION OPERATIONS?**

Authority: 30 CFR 250.505

Enforcement Action: C

30 CFR 250.513(a)

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-completion operation if the operator does not have written approval to conduct well-completion operations.

Note: The well is the component.

WELL-WORKOVERS

W-801

HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT MANAGER PRIOR TO CONDUCTING NON-ROUTINE WELL-WORKOVER OPERATIONS?

Authority 30 CFR 250.601
30 CFR 250.605
30 CFR 250.613(a)

Enforcement Action: C

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-workover operation if the operator does not have written approval to conduct non-routine well-workover operations.

Note: The well is the component.

DECOMMISSIONING

A-801

IS ISOLATION OF ZONES IN OPEN HOLE ACHIEVED?

Authority: 30 CFR 250.1715(a)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that cement plugs were placed to extend from a minimum of 100 feet below the bottom to 100 feet above the top of any oil, gas, or freshwater zones.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of well plugging operations if the cement plugs were not placed as required.

PRODUCTION

P-801

HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED OIL-WELL GAS IN EXCESS OF 48 CONTINUOUS HOURS OR 144 CUMULATIVE HOURS DURING ANY MONTH?

Authority: 30 CFR 250.1105(a)(2)(i)
30 CFR 250.1105(a)(2)(ii)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review flaring or venting records to determine if continuous flaring or venting of oil-well gas has exceeded 48 hours of cumulative flaring or venting of oil well gas has exceeded 144 hours during any month without prior approval of the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 48 continuous hours or the 144 cumulative hours have been exceeded during a month without approval.

Issue one component shut-in (**C**) INC for one or more affected wells if flaring or venting is ongoing and records indicate that, in the current month, 48 continuous hours or the 144 cumulative hours have been exceeded without approval.

Note: The affected well is the component.

PIPELINES

INSTALLATION/RELOCATION

L-801	<p>HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO THE COMMENCEMENT OF THE INSTALLATION OR RELOCATION OF A PIPELINE?</p> <p>Authority: 30 CFR 250.1008(a) Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE: Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to commencing the installation or relocation of a pipeline.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at lease 48 hours prior to commencing the installation or relocation of the pipeline. Issue one component shut-in (C) INC for a pipeline audit if the installation or relocation of the pipeline is in progress and the lessee or the ROW holder has not notified the Regional Supervisor prior to the commencement of the operation. Note: The pipeline is the component.</p>
L-802	<p>WAS THE PIPELINE CONSTRUCTED IN A MANNER TO MINIMIZE DEVIATION FROM THE ROW GRANTED?</p> <p>Authority: 30 CFR 250.1012(b)(1) Enforcement Action: W/C 30 CFR 250.1012(b)(3)</p> <p>Note: The Regional Supervisor will make the determination of whether a deviation is substantial.</p> <p>INSPECTION PROCEDURE: Review records in TIMS GIS and compare the as-built information submitted with the approved ROW associated pipeline segment route.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted, but the deviation is determined to be not substantial. Issue one component shut-in (C) INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted and the deviation is determined to be substantial. Note: The pipeline is the component.</p>
L-803	<p>HAS THE LESSEE OR THE ROW HOLDER SUBMITTED A COMPLETION REPORT TO THE REGIONAL SUPERVISOR AFTER COMPLETION OF ANY PIPELINE CONSTRUCTION?</p> <p>Authority: 30 CFR 250.1008(b) Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE: Verify that the lessee has submitted a report that conforms to the requirements of 30 CFR 250.1008(b) to the Regional Supervisor after completion of any pipeline construction.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a pipeline audit if the lessee or ROW holder did not submit a report to the Regional Supervisor within 90 calendar days after completion of a pipeline construction. Issue one component shut-in (C) INC for a pipeline audit if the report does not conform to the requirements of 30 CFR 250.1008(b). Note: The pipeline is the component.</p>

L-804

IS THE PIPELINE PROPERLY MAINTAINED AND USED FOR THE PURPOSE FOR WHICH THE ROW WAS GRANTED?

Authority: 30 CFR 250.1009(e)

Enforcement Action: W/C

Note: Temporary cessation or suspension of pipeline operations shall not cause the ROW grant to expire.

INSPECTION PROCEDURE:

Review office file records, TIMS data, and any pertinent information received to determine if the pipeline is:

1. In operation;
2. Properly maintained; and
3. Used for the purpose for which the ROW was granted.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a pipeline audit if the pipeline is not used for the purpose for which the ROW was granted.

Issue one component shut-in (**C**) INC for a pipeline audit if the pipeline is not adequately maintained and poses an immediate danger to personnel, the environment, or a facility.

Note: The pipeline is the component.

TESTING

L-811	<p>HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO A PRESSURE TEST ON A PIPELINE?</p> <p>Authority: 30 CFR 250.1008(a) Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE: Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to conducting a pressure test on a pipeline.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at lease 48 hours prior to conducting a pressure test on a pipeline. Issue one component shut-in (C) INC for a pipeline audit if a pressure test on the pipeline is currently being conducted and the lessee or the ROW holder has not notified the Regional Supervisor prior to commencing the operation. Note: The pipeline is the component.</p>
L-812	<p>HAVE THE RESULTS AND CONCLUSIONS OF MEASUREMENTS OF PIPE-TO-ELECTROLYTE POTENTIAL MEASUREMENTS TAKEN ANNUALLY ON EACH DOI PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1000(e)(1) Enforcement Action: C 30 CFR 250.1005(b) 30 CFR 250.1008(h)</p> <p>INSPECTION PROCEDURE: Verify that the results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually on each DOI pipeline were submitted to the Regional Supervisor before March of each year.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one component shut-in (C) INC for a pipeline audit if:</p> <ol style="list-style-type: none">1. Results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually are not reported to the Regional Supervisor before March of each year.2. Measurements of pipe-to-electrolyte potential measurements are not taken annually on a DOI pipeline.3. Measurements of pipe-to-electrolyte potential measurements taken annually on a DOI pipeline are not analyzed.4. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment. <p>Note: The pipeline is the component.</p>
L-813	<p>HAVE PIPELINES THAT WERE INSTALLED, RELOCATED, UPRATED, OR REACTIVATED AFTER BEING OUT OF SERVICE FOR MORE THAN 1 YEAR, BEEN HYDROSTATICALLY TESTED WITH WATER TO A STABILIZED PRESSURE OF AT LEAST 1.25 TIMES THE MAOP FOR AT LEAST 8 HOURS?</p> <p>Authority: 30 CFR 250.1003(b)(1) Enforcement Action: W/C 30 CFR 250.1003(b)(3)</p> <p>INSPECTION PROCEDURE: 1. Review the construction report to determine if a hydrostatic pressure test was performed on the pipeline for 8 hours and if the appropriate instruments (i.e., dead weight gauge, temperature recorder, and pressure recorder) were utilized. 2. Check dead weight test readings, temperature chart, and pressure chart.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a pipeline construction report audit if:</p> <ol style="list-style-type: none">1. Any of the appropriate instruments were not utilized.2. Collected data is not available. <p>Issue one component shut-in (C) INC for a pipeline construction audit if the pipeline was not tested for the required pressure and time period. Note: The pipeline is the component.</p>

OUT-OF-SERVICE REPORTING

L-821	<p>HAS THE LESSEE OR THE ROW HOLDER REPORTED A PIPELINE TAKEN OUT OF SERVICE TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1008(c) Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none">1. Verify that the lessee or the ROW holder has reported any pipeline taken out of service to the Regional Supervisor.2. Verify that written confirmation is provided if the period of time the pipeline is out of service is greater than 60 days. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for a pipeline audit if written confirmation is not provided when the period of time that the pipeline is out of service is greater than 60 days.</p>
L-822	<p>HAS THE LESSEE OR THE ROW HOLDER REPORTED ANY PIPELINE SAFETY EQUIPMENT TAKEN OUT OF SERVICE FOR MORE THAN 12 HOURS TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1000(e)(1) Enforcement Action: W/C 30 CFR 250.1008(d)</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that the lessee or the ROW holder has reported any pipeline safety equipment taken out of service for more than 12 hours to the Regional Supervisor.</p> <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC if any pipeline safety equipment was taken out of service for a period of more than 12 hours and not reported to the Regional Supervisor.</p> <p>Issue one component shut-in (C) INC for a pipeline audit if the Regional Supervisor cannot determine that continued activity without pipeline safety equipment would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish and other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.</p> <p>Note: The pipeline is the component.</p>
L-823	<p>HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED WHEN THE PIPELINE SAFETY EQUIPMENT IS RETURNED TO SERVICE?</p> <p>Authority: 30 CFR 250.1008(d) Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <p>Verify that the lessee or the ROW holder has reported to the Regional Supervisor when pipeline safety equipment is returned to service.</p> <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for failure to notify the Regional Supervisor when pipeline safety equipment is returned to service.</p>

REPAIR

L-831 HAS THE LESSEE OR THE ROW HOLDER NOTIFIED THE REGIONAL SUPERVISOR PRIOR TO THE REPAIR OF A PIPELINE OR AS SOON AS PRACTICABLE THEREAFTER?

Authority: 30 CFR 250.1008(e)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to the repair of a pipeline or as soon as practicable thereafter.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline repair if the Regional Supervisor was not notified prior to the repair of a pipeline or as soon as practicable thereafter.

L-832 HAS A DETAILED REPORT ON THE REPAIR OF A PIPELINE OR PIPELINE COMPONENT BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1000(e)(1)

Enforcement Action: W/C

30 CFR 250.1008(e)

INSPECTION PROCEDURE:

1. Verify that a detailed report on the repair of a pipeline or pipeline component was submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. Verify that the detailed report includes the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline or pipeline component repair if a detailed report on the repair does not include:

1. Description of the repairs;
2. Results of pressure test; and
3. Date the pipeline or pipeline component was returned to service.

Issue one component shut-in (C) INC for a pipeline or pipeline component repair if:

1. A detailed report on the repair was not submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

L-833 HAS THE LESSEE SUBMITTED TO THE REGIONAL SUPERVISOR A COMPREHENSIVE WRITTEN REPORT OF ANY PIPELINE FAILURE ANALYZED?

Authority: 30 CFR 250.1008(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that a comprehensive written report of the analysis of any pipeline failure was submitted by the lessee to the Regional Supervisor when requested.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline failure audit if a comprehensive written report of the analysis of the pipeline failure was not submitted to the Regional Supervisor within the time frame specified.

L-834

HAS A PLAN OF CORRECTIVE ACTION FOR OBSERVED DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL?

Authority: 30 CFR 250.1000(e)(1)

Enforcement Action: W/C

30 CFR 250.1008(g)

INSPECTION PROCEDURE:

Verify that a plan of corrective action of observed detrimental environmental factors affecting a pipeline was submitted to the Regional Supervisor for approval within 30 days of the observation.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a corrective plan audit if a plan of corrective action for observed detrimental environmental factors affecting a pipeline was not submitted to the Regional Supervisor for approval within 30 calendar days of the observation.

Issue one component shut-in (C) INC for a corrective plan audit if:

1. A plan of corrective action was not prepared for known detrimental environmental factors that would affect a pipeline.
2. After a review of the report, the Regional Supervisor cannot determine that proposed corrective action would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

L-835

HAS A REPORT OF REMEDIAL ACTION TAKEN FOR DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR BY THE LESSEE OR ROW HOLDER?

Authority: 30 CFR 250.1000(e)(1)

Enforcement Action: W/C

30 CFR 250.1008(g)

INSPECTION PROCEDURE:

Verify that a report of remedial action taken for detrimental environmental factors affecting a pipeline has been submitted to the Regional Supervisor within 30 days after completion of the remedial action.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a remedial action report audit if the report of remedial action taken for detrimental environmental factors affecting a pipeline was not submitted by the lessee or ROW holder to the Regional Supervisor within 30 calendar days after completion of the remedial action.

Issue one component shut-in (C) INC for a remedial action report audit if, after a review of the remedial action taken report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

DECOMMISSIONING

L-841

ARE PIPELINES OUT OF SERVICE FOR 5 YEARS, OR MORE, REMOVED IF THE PIPELINES ARE DETERMINED BY THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS?

Authority: 30 CFR 250.1006(b)(3)

Enforcement Action: W

30 CFR 250.1752

30 CFR 250.1754

INSPECTION PROCEDURE:

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
 - A. Pigged, unless the Regional Supervisor determines that pigging is not practical.
 - B. Flushed.
 - C. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the out-of-service pipelines are not removed as required.

COMPANY INFORMATION

L-851

HAS THE ROW HOLDER KEPT THE REGIONAL SUPERVISOR INFORMED OF THE COMPANY'S OFFICE ADDRESS, AND THE NAME AND ADDRESS OF OFFICER OR AGENT AUTHORIZED TO BE SERVED WITH PROCESS?

Authority: 30 CFR 250.1009(c)(5)

Enforcement Action: W

INSPECTION PROCEDURE:

Review the MMS office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each company file audit if the information is not correct or current.

CONSERVATION OF RESOURCES

INTERESTS

R-801 **HAS THE OPERATOR RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR TO COMMENCE PRODUCTION FROM A WELL COMPLETION THAT IS WITHIN 500 FEET FROM A UNIT OR LEASE LINE FOR WHICH THE UNIT, LEASE, OR ROYALTY INTERESTS ARE NOT THE SAME?**

Authority: 30 CFR 250.1101(b)

Enforcement Action: C

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if the producing interval of the well is within 500 feet from a unit or lease line for which the unit, lease, or royalty interests are not the same. If so, determine whether approval was received before production began.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for a well audit if the operator is producing, without approval, from the well in which the completed interval is closer than 500 feet from a lower royalty lease or unit.

Note: The well is the component.

R-802 **HAS THE OPERATOR RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR BEFORE COMPLETING AN INTERVAL WHICH ENCOMPASSES MULTIPLE RESERVOIRS THAT ARE COMMINGLED WITHIN THE WELLBORE?**

Authority: 30 CFR 250.1106(a)

Enforcement Action: W/C

30 CFR 250.1106(b)

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if two or more separate reservoirs have been downhole commingled without prior approval and if any of the commingled reservoirs are competitive.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a well audit if the audit shows that the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval.

Issue one component shut-in (C) INC for a well audit if the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval and one or more of the commingled reservoirs are competitive.

Note: The well is the component.

ENHANCED RECOVERY

R-811	<p>HAS THE LESSEE RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR PRIOR TO INITIATING AN ENHANCED OIL AND GAS RECOVERY PROJECT OR OTHER TYPE OF INJECTION PROJECT?</p> <p>Authority: 30 CFR 250.1107(b) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if the enhanced oil and gas recovery operations were approved by the Regional Supervisor prior to their initiation.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if the enhanced oil and gas operations were initiated prior to receiving approval of the Regional Supervisor.</p>
R-812	<p>HAS THE LESSEE INITIATED ENHANCED OIL AND GAS RECOVERY OPERATIONS IN A TIMELY MANNER FOR COMPETITIVE AND NONCOMPETITIVE RESERVOIRS?</p> <p>Authority: 30 CFR 250.1107(a) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records in TIMS and other documentation to determine if enhanced oil and gas recovery operations were initiated in a timely manner where such operations would result in an increased ultimate recovery of oil and gas.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if the audit shows that enhanced oil and gas operations were not:</p> <ol style="list-style-type: none">1. Initiated in a timely manner.2. Based upon sound engineering and economic principles.
R-813	<p>ARE REPORTS OF THE VOLUMES OF OIL, GAS, AND OTHER SUBSTANCES INJECTED INTO, PRODUCED FROM, OR REPRODUCED FROM A RESERVOIR SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?</p> <p>Authority: 30 CFR 250.1107(c) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if reports of the volumes of oil, gas, and other substances injected into, produced from, or reproduced from a reservoir are submitted to the Regional Supervisor when requested.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a records audit if the required reports were not submitted to the Regional Supervisor when requested.</p>

PRODUCTION RATE

R-821	<p>HAS THE LESSEE CONDUCTED A WELL-FLOW POTENTIAL TEST WITHIN 30 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION ON A NEW, RECOMPLETED, OR REWORKED WELL COMPLETION?</p> <p>Authority: 30 CFR 250.1102(b)(2) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if a well-flow potential test was completed within 30 days after the date of the first continuous production on a new, recompleted, or reworked well completion.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for the well test audit if the well-flow potential test was not completed within the required time frame.</p>
R-822	<p>HAS THE LESSEE SUBMITTED, FOR APPROVAL BY THE REGIONAL SUPERVISOR, A PROPOSED MPR WITH THE WELL-FLOW POTENTIAL TEST DATA, ON FORM MMS-126, WELL POTENTIAL TEST REPORT, WITHIN 15 CALENDAR DAYS AFTER THE END OF THE TEST PERIOD?</p> <p>Authority: 30 CFR 250.1102(b)(2) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if a proposed MPR with the associated well-flow potential test data for each individual well completion was submitted for approval to the Regional Supervisor, within 15 days after the end of the well test period.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if the proposed MPR with the associated well test data, on a Form MMS-126, has not been submitted for approval to the Regional Supervisor within the required time frame.</p>
R-823	<p>ARE THE WELLS AND RESERVOIRS BEING PRODUCED AT RATES THAT WILL DEplete THE HYDROCARBON RESOURCES IN A MANNER THAT MAXIMIZES ULTIMATE RECOVERY WITHOUT ADVERSELY AFFECTING CORRELATIVE RIGHTS?</p> <p>Authority: 30 CFR 250.1101(a) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review well and reservoir records to determine if hydrocarbon resources are produced in a manner that will maximize their ultimate recovery without adversely affecting correlative rights.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if the records show that:</p> <ol style="list-style-type: none">1. Ultimately recovery of hydrocarbon resources will be significantly adversely impacted by current production operations.2. Correlative rights are adversely affected.

WELL TESTS

R-831	<p>HAS THE LESSEE CONDUCTED AT LEAST ONE WELL TEST FOR PRODUCING OIL-WELL OR GAS-WELL COMPLETIONS, DURING A HALF-CALENDAR YEAR?</p> <p>Authority: 30 CFR 250.1102(b)(3) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if the lessee has conducted at least one well test for producing oil-well or gas-well completions during a half-calendar year.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if at least one well test was not conducted for the completion during the current half-calendar year.</p> <hr/>
R-832	<p>HAS THE LESSEE SUBMITTED WELL TEST RESULTS FOR EACH PRODUCING OIL-WELL AND GAS-WELL COMPLETION TO THE REGIONAL SUPERVISOR ON FORM MMS-128, SEMIANNUAL WELL TEST REPORT, WITHIN 45 DAYS AFTER THE TEST WAS CONDUCTED?</p> <p>Authority: 30 CFR 250.1102(b)(3) Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Review records to determine if the lessee well test data was submitted well test results for each producing oil-well and gas-well completion to the Regional Supervisor within 45 calendar days after the test was conducted.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for a production audit if well test results for a producing oil-well or gas-well completion has not been submitted to the Regional Supervisor within the required time frame.</p> <hr/>

PRODUCTION MEASUREMENT AND SITE SECURITY

CALIBRATION

M-801	<p>IS EACH MECHANICAL DISPLACEMENT PROVER AND TANK PROVER CALIBRATED AT LEAST ONCE EVERY 5 YEARS AND A COPY OF THE CALIBRATION REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1202(f) Enforcement Action: W</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none">1. Verify that each mechanical displacement prover and tank prover has been calibrated in accordance with API MPMS at least once every 5 years.2. Verify that each calibration report has been submitted to the Regional Supervisor within 15 days after the calibration. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for the calibration verification of one or more provers if:</p> <ol style="list-style-type: none">1. The calibration did not occur at least once every 5 years.2. The calibration report was not submitted to the Regional Supervisor within 15 days after the calibration.
M-802	<p>IS EACH OPERATING ROYALTY METER PROVED MONTHLY TO DETERMINE THE METER FACTOR AND IS THE PROVING REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1202(d)(3) Enforcement Action: W/C 30 CFR 250.1202(d)(4) 30 CFR 250.1202(d)(5)</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none">1. Verify that each royalty meter is proved to determine the meter factor monthly, but not to exceed 42 days, unless another proving schedule has been approved by the Regional Supervisor.2. Verify that a copy of each royalty meter proving report is submitted to the Regional Supervisor within 15 days after the end of the month. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for a proving audit of one or more royalty meters if the current provings have exceeded the approved proving schedule.</p> <p>Issue one component shut-in (C) INC for a proving audit of a royalty meter if the current proving report was not submitted to the Regional Supervisor within 15 days after the end of the month.</p> <p>Note: The royalty meter is the component.</p>
M-803	<p>IS THE RUN TICKET FOR EACH ROYALTY METER AND ROYALTY TANK COMPLETE, WAS IT PULLED WHEN REQUIRED, AND WAS IT SUBMITTED TO THE REGIONAL SUPERVISOR?</p> <p>Authority: 30 CFR 250.1202(c) Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none">1. Review the royalty meter or royalty tank run tickets to verify that they clearly identify all observed data, all correction factors, on/off seal numbers (royalty tanks only), and the net standard volume.2. Verify that a run ticket was pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.3. Verify that a copy of each run ticket is submitted to the Regional Supervisor within 15 days after the end of the month. <p>IF NONCOMPLIANCE EXISTS:</p> <p>Issue one warning (W) INC for a run ticket audit of one or more royalty meter and royalty tank if:</p> <ol style="list-style-type: none">1. The current run ticket does not clearly identify all observed data, all correction factors, on/off seal numbers (royalty tank only), and the net standard volume.2. The current run ticket was not pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor. <p>Issue one component shut-in (C) INC for a run ticket audit of a royalty meter or royalty tank if the current run ticket was not submitted to the Regional Supervisor within 15 days after the end of the month.</p> <p>Note: The royalty meter or the royalty tank is the component.</p>

LIQUID ROYALTY METER

M-821

ARE LIQUID HYDROCARBON ROYALTY METERS TAKEN OUT OF SERVICE, REPAIRED OR REPLACED, AND REPROVEN IF THE DIFFERENCE BETWEEN THE METER FACTOR AND THE PREVIOUS METER FACTOR EXCEEDS 0.0025?

Authority: 30 CFR 250.1202(i)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

1. If a malfunction occurs:
 - A. Ensure that the meter remains out of service until the malfunction is corrected.
 - B. Ensure that the average of the malfunction factor and the previous factor is applied to the production measured through the meter between the date of the previous factor and the date of the malfunction factor.
 - C. Ensure that proving reports indicate that a malfunction occurred and show all appropriate remarks regarding subsequent repairs or adjustments.

Note: If A through C above is accomplished, an INC is not warranted.

2. Check proving reports for previous meter malfunctions.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a proving report audit if the proving report indicates that:

1. A previous meter malfunction occurred, the meter was taken out of service, repaired or replaced, and reproved; but information as to production averaging and meter repair or replacement is not available.
 2. If proving reports indicate that a previous meter malfunction occurred and the meter was not taken out of service, repaired or replaced, and reproved.
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GAS ROYALTY METER

M-831

ARE GAS VOLUME AND QUALITY STATEMENT DISPOSITIONS ON GAS ROYALTY METERS SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?

Authority: 30 CFR 250.1203(b)(6)

Enforcement Action: W/C

30 CFR 250.1203(b)(7)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

INSPECTION PROCEDURE:

1. Verify that the gas volume and quality statements and additional information were submitted when requested.
2. Verify that the gas volume and quality statements clearly identify all required data.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a gas volume audit of one or more gas royalty meters if the gas volume and quality statements and additional information do not clearly identify all required data.

Issue one component shut-in (**C**) INC for a gas volume audit of a gas royalty meter if the requested gas volume and quality statements and additional information requested by the Regional Supervisor are not submitted within the time frame specified.

Note: The gas royalty meter is the component.

GEOLOGICAL AND GEOPHYSICAL EXPLORATION

PERMITS

O-801

IS REQUIRED PERMIT APPROVED OR NOTICE OF SCIENTIFIC RESEARCH FILED PRIOR TO CONDUCTING A GEOLOGICAL OR GEOPHYSICAL ACTIVITY?

Authority: 30 CFR 251.1

Enforcement Action: S

30 CFR 251.3

30 CFR 251.4

30 CFR 251.5

30 CFR 251.10

INSPECTION PROCEDURE:

Verify that permit has been issued or a notice filed with MMS prior to commencing a G&G activity.

IF NONCOMPLIANCE EXISTS:

Issue one facility shut-in (**S**) INC for a G&G activity audit if the activity is conducted without a permit or notice.

Note: The G&G activity is the facility.

O-802

ARE GEOLOGICAL AND GEOPHYSICAL ACTIVITIES BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?

Authority: 30 CFR 251.1

Enforcement Action: W/S

30 CFR 251.3

30 CFR 251.4

30 CFR 251.6

30 CFR 251.7

30 CFR 251.8

30 CFR 251.9

30 CFR 251.10

INSPECTION PROCEDURE:

Verify that G&G activities are being conducted in accordance with regulations and the approved permit.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a G&G activity audit if the G&G activity was conducted in violation of regulations and an approved permit.

Issue one facility shut-in (S) INC for a G&G activity audit if the G&G activity currently being performed is being conducted in violation of regulation and an approved permit.

Note: The G&G activity is the facility.

DATA

O-811

**ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION
SUBMITTED TO MMS WITHIN THE TIME FRAME SPECIFIED BY REGULATION
AND PERMIT?**

Authority: 30 CFR 251.1

Enforcement Action: W

30 CFR 251.10

30 CFR 251.11

30 CFR 251.12

INSPECTION PROCEDURE:

Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.
